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*Co-Counsel to the Ad Hoc Group of OpCo Creditors*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

|  |   |                         |
|--|---|-------------------------|
| In re  | ) | Chapter 11              |
| GRUPO AEROMÉXICO, S.A.B. de C.V., <i>et al.</i> , <sup>1</sup> | ) | Case No. 20-11563 (SCC) |
| Debtors.   | ) | (Jointly Administered)  |

**VERIFIED STATEMENT PURSUANT TO BANKRUPTCY RULE 2019**

Katten Muchin Rosenman LLP (“Katten”) and Arnold & Porter Kaye Scholer LLP (“A&P”) hereby make the following verified statement (this “Verified Statement”), pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), in connection with Katten and A&P’s representation in these chapter 11 cases of Invictus Global Management, LLC (“Invictus”), Corvid Peak Capital Management LLC (“Corvid Peak”), Hain Capital Group,

<sup>1</sup> The Debtors in these chapter 11 cases, along with each Debtor’s registration number in the applicable jurisdiction, are as follows: Grupo Aeroméxico, S.A.B. de C.V. 286676; Aerovías de México, S.A. de C.V. 108984; Aerolitoral, S.A. de C.V. 217315; and Aerovías Empresa de Cargo, S.A. de C.V. 437094-1. The Debtors’ corporate headquarters is located at Paseo de la Reforma No. 243, piso 25 Colonia Cuauhtémoc, Mexico City, C.P. 06500.

LLC (“Hain Capital”), and Livello Capital Management LP (“Livello” and, together with Invictus, Corvid Peak, and Hain Capital, the “Ad Hoc Group of OpCo Creditors” or “Ad Hoc Group”):

1. The Ad Hoc Group has retained Katten and A&P as co-counsel in connection with the chapter 11 cases of Grupo Aeroméxico, S.A.B. de C.V. and its affiliated debtors and debtors in possession (the “Debtors”).

2. As of the date of this Verified Statement, Katten and A&P represent the Ad Hoc Group and do not represent or purport to represent any entities other than the Ad Hoc Group in connection with the Debtors’ chapter 11 cases. In addition, neither Invictus, Corvid Peak, Hain Capital, nor Livello represent or purport to represent any other entities within the Debtors’ chapter 11 cases.

3. Members of the Ad Hoc Group of OpCo Creditors have indicated to Katten and A&P that they beneficially own disclosable economic interests, or act as investment managers or advisors to funds or accounts that beneficially own disclosable economic interests, in relation to the Debtors. In accordance with Bankruptcy Rule 2019 and based upon information provided to Katten and A&P by each of the members of the Ad Hoc Group, attached hereto as **Exhibit A** is a list of the names, addresses, nature and amount of all disclosable economic interests of each of the Ad Hoc Group members in relation to the Debtors.

4. Nothing contained in this Verified Statement (or **Exhibit A** hereto) should be construed as a limitation upon, or waiver of, any rights of Invictus, Corvid Peak, Hain Capital, or Livello to assert, file, and/or amend any claim or proof of claim filed in accordance with applicable law and any orders entered in these cases.

5. The information herein is provided only for the purpose of complying with Bankruptcy Rule 2019 and is not intended for any other use or purpose.

6. Katten and A&P reserve the right to amend this Verified Statement as may be necessary in accordance with the requirements set forth in Bankruptcy Rule 2019.

7. The undersigned hereby verifies that this Verified Statement is true and accurate to the best of the undersigned's knowledge and belief.

Dated: November 26, 2021  
New York, NY

/s/ Steven J. Reisman  
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- and -

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**Exhibit A**<sup>2</sup>

| Name <sup>3</sup>                  | Address   | Aggregate Principal Amounts of Claims                  |   |                                 |
|------------------------------------|---|--|---|---------------------------------|
|                                    |   | General Unsecured Claims against Aerovías <sup>4</sup> | General Unsecured Claims against Aerolitoral <sup>5</sup> | 7.00% Senior Notes <sup>6</sup> |
| Invictus Global Management, LLC    | 310 Comal Street<br>Building A, Suite 229<br>Austin, TX 78702                         | \$48,537,744.21  |   |                                 |
| Corvid Peak Capital Management LLC | 299 Park Avenue<br>13 <sup>th</sup> Floor<br>New York, NY 10171                       | \$46,375,364.42  |   | \$6,960,000.00                  |
| Hain Capital Group, LLC            | Meadows Office Complex<br>301 Route 17, 7 <sup>th</sup> Floor<br>Rutherford, NJ 07070 | \$15,737,906.45  | \$14,219.10   |                                 |
| Livello Capital Management LP      | 1 World Trade Center<br>85 <sup>th</sup> Floor<br>New York, NY 10007                  | \$12,796,333.00  |   | \$2,600,000.00                  |

<sup>2</sup> To the best of Katten and A&P's knowledge, the information herein is accurate as of November 24, 2021. The amounts set forth herein include only the outstanding principal amounts of the applicable debt and do not include accrued and unpaid interest, fees, or other amounts that may be owing under the applicable documents.

<sup>3</sup> Each entity on this Exhibit A is listed either in its principal capacity or in its capacity as agent, investment advisor, or investment manager for certain investment funds or accounts or their respective subsidiaries that hold disclosable economic interests in relation to the Debtors.

<sup>4</sup> Class 3(c) general unsecured claims against Aerovías de México, S.A. de C.V. as defined in the *Debtors' Joint Plan Of Reorganization Under Chapter 11 of the Bankruptcy Code* [Docket No. 1898].

<sup>5</sup> Class 3(d) general unsecured claims against Aeroméxico Connect (i.e., Aerolitoral, S.A. de C.V.) as defined in the *Debtors' Joint Plan Of Reorganization Under Chapter 11 of the Bankruptcy Code* [Docket No. 1898].

<sup>6</sup> 7.000% Senior Notes due in 2025 issued by Aerovías and guaranteed by Grupo Aeroméxico pursuant to the Senior Notes Indenture as defined in the *Debtors' Joint Plan Of Reorganization Under Chapter 11 of the Bankruptcy Code* [Docket No. 1898].